

AR 201-12723



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Carol Browner, Administrator
U.S. EPA
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-to-Know Program

August 2, 2000

RETURN RECEIPT REQUESTED

In re: HPV Chemicals Program
Registration Number:

Dear Administrator Browner,

As Solutia began implementation of our U.S. HPV Chemicals program, we reviewed not only the commitments from the 1990 IUR submission, but also those from the 1994 IUR submission. We are writing to clarify some changes regarding five of the chemicals or groupings Solutia has agreed to sponsor. The chemicals needing clarification are:

1. Dihexylamine, 6,6'-diamino (CAS Number 143-23-7)

Solutia originally volunteered to conduct studies on the purified version of this chemical. However, since we do not manufacture the purified chemical, we later amended that commitment to state that we volunteer to conduct studies on a UVCB version of that product, "Hexanedinitrile, hydrogenated, high boiling fraction" (CAS Number 68411-90-5). This mixture is the product we actually manufacture and it contains CAS Number 143-23-7 as the major component. The Agency appeared to accept the correction, but has retained CAS Number 143-23-7 as "unsponsored" on the March 3, 2000 updated HPV Chemical Lists. It is our understanding that the other US manufacturer also manufactures, and intends to test, the UVCB chemical. Thus we recommend that CAS Number 143-23-7 be removed from the HPV Chemical List to avoid future questions with TSCA Test Rule sponsorship.

2. 1,6-Hexanediaminium, N,N,N',N'-tetrabutyl-N, N'-diethyl-, dihydroxide (CAS Number 111960-92-0)

The Agency identified this chemical as an unsponsored chemical in the March 6, 2000 HPV Additions (1994) Chemical List. In 1998, as shown in the 1998 TSCA Inventory Update, Solutia manufactured this chemical in a quantity exceeding 1M pounds. We are

therefore volunteering to sponsor this chemical under the HPV program for initiation in 2003.

3. Adipic acid, compound with 1,6-hexanediamine (1:1) (CAS Number 3323-53-3)

Solutia previously volunteered under the U.S. HPV Chemicals program to support this chemical. Since then we have learned of an international consortium for testing this chemical and have committed to participate (with BASF as the lead company) in the IECA program for this product. We do not plan to conduct duplicate animal testing nor submit a duplicate dossier under the U.S. HPV Challenge. Please correct your records accordingly.

4. L-aspartic acid (CAS Number 56-84-8), Fumaric acid, diammonium salt (CAS Number 14548-85-7) and L-aspartic acid, monoammonium salt (CAS Number 130296-88-7)

The Agency has identified l-aspartic acid and these two process intermediates as unsponsored chemicals in the HPV Additions (1994) Chemical List. Solutia manufactures these chemicals, but did not volunteer for them under the HPV Challenge. We believe this listing to be the result of our 1994 TSCA IUR submission in which we reported manufacture of these chemicals in excess of 1 million pounds. Based on new guidance from Agency staff, we now understand that our 1994 and 1998 IUR submissions should not have included that portion of l-aspartic acid production which was used as raw materials in FDA controlled applications. The estimated 2000 production actually used in TSCA controlled applications is approximately 50,000 pounds. We are concurrently notifying the Agency of the correction to our 1998 IUR submission (see enclosure). We request the Agency remove all three of these products from the HPV Chemicals List since TSCA controlled manufacture does not exceed 1 million pounds per year.

QUATERPHENYL

5. ~~Quarterphenyl~~ (CAS Number 29036-02-0)

The Agency has identified CAS Number 29036-02-0 as an unsponsored chemical in the HPV Additions (1994) Chemical List. In the past Solutia has manufactured and marketed chemicals using that CAS Number. However the name "quarterphenyl" is more appropriately associated with another chemical identifier, "Polyphenyls, Biphenyl and Terphenyl free", CAS Number 68514-80-7. All of Solutia's quarterphenyl products are manufactured and marketed as mixtures with terphenyls, also identified under several different CAS Numbers on the HPV Chemical List. We propose to submit one package of data on the mixture of the following five structurally similar chemicals as a category under the HPV program:

26140-63-3	Terphenyl
92-06-8	m-terphenyl
92-94-4	p-terphenyl
29036-02-0	Quarterphenyl

29036-02-0
68514-80-7

Quarterphenyl
Polyphenyls, Biphenyl and Terphenyl free

We therefore request the Agency to:

- A. Adjust Agency records as appropriate to reflect that all of the CAS Numbers listed above will be included in a single category.
- B. Add Solutia's commitment to sponsor CAS Number 29036-02-0 in 2003.

Thank you for your consideration of these changes in the HPV Chemicals program. We are finalizing discussions with another company to form consortia for CAS Number 68411-90-5 and other chemicals for which we have volunteered. We will inform the Agency independently of the finalization of those consortia.

Sincerely,

James P. Mieure, Ph. D.
Manager, Product Stewardship

Enclosure: August 2, 2000 letter to OPPT Document Control Officer with actual production volumes deleted as confidential.

cc: C. Auer; OPPTS; 401 M Street, SW; Washington, DC 20460
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